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June 28, 2022

**VIA ECF**

The Honorable Barbara Moses  
United States Magistrate Judge  
United States District Court  
for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: *U.S. Bank N.A. v. Triaxx Asset Management LLC, et al.,*  
No. 18-cv-04044 (BCM)

Dear Judge Moses:

This firm represents Triaxx Asset Management LLC (“TAM”) and Phoenix Real Estate Solutions Ltd. (“Phoenix”, and, together with TAM, the “TAM Parties”) in the above-referenced matter. We write pursuant to Rule 2(i) of the Court’s Individual Practices to respectfully request that the Court permit the Parties to file the Joint Letter to the Court dated June 28, 2022, Dkt. No. [431] (the “Letter”), seeking the Court’s permission to reschedule the depositions of Thomas Priore and Vishal Garg, under seal.

The Letter contains sensitive and highly personal information about the reasons for needing to reschedule Mr. Garg’s deposition, which should not be disclosed publicly.

In accordance with the Court’s Individual Practices, at the TAM Parties’ request, the Parties have electronically filed the Letter under seal.

Application GRANTED. The Letter (Dkt. No. 431) may be filed under seal. The TAM Parties shall file a redacted version on the public docket, only redacting the sensitive information. The extension of the fact deposition deadline requested in the Letter (Dkt. No. 431) is GRANTED. The fact deposition deadline is extended to **July 22, 2022**. The status conference scheduled for July 13, 2022 will proceed as scheduled. The deadline for the parties to submit their joint status update letter is EXTENDED to **July 8, 2022**. SO ORDERED.

A handwritten signature in blue ink, appearing to read "Barbara Moses".

Barbara Moses  
United States Magistrate Judge  
June 29, 2022

Respectfully submitted,

s/ Anil K. Vassanji  
Anil K. Vassanji